

CERTIFICATE OF SERVICE

I, Regina McFadden, a secretary with the law firm of Womble Carlyle Sandridge & Rice, PLLC, do hereby certify that a true and correct copy of the foregoing "Counterproposal" was served by U.S. mail, first class, postage-prepaid on the 20th day of May, 2002, on the following individuals:

Mr. James Ballis
Federal Communications Commission
International Bureau
445 Twelfth Street, SW - Room 7-A515
Washington, DC 20554

Mr. Jeffrey A. Smith
McCody Broadcasting Group, Inc.
885 Third Avenue, 34th Floor
New York, NY 10022

Guyann Corporation
P.O. Box 1930
Flagstaff, AZ 86002

McMurray Communications, Inc.
58 Skyline Crest
Monterey, CA 93940

Linda C. Potyka
1730 E. Indigo Street
Mesa, AZ 85203

Alan C. Campbell
Irwin Campbell & Tannenwald, PC
1730 Rhode Island Avenue, NW
Suite 200
Washington, DC 20036-3101


Regina McFadden

State of Illinois)
Community of Forest Lake) ss:
County of Lake)

Seal

Technical Narrative

I. Proposed 246A Cameron, AZ

The petitioner in Docket [02-73] RM-10400 has requested channel 246A at coordinates 35-52-30 N and 111-24-48 W. Cameron is a Census Designated Place [CDP] with 2000 Census population of 978 persons.

The allotment of 246A at Cameron, AZ is mutually exclusive with petitioner's request for 247C at First Mesa, AZ. First Mesa, AZ is also a CDP but with 2000 Census population of 1,124 persons, some 16% greater than that of Cameron. This Counterproposal puts forth a plan which would allot 289A at the coordinates used in the NPRM. Alternatively, it appears that 238A or 241A would also meet the requirements of 73.207 at the requested site. The spacings to co-channel and related channel stations and allotments for 289A at Cameron, AZ is detailed in exhibit C1.

It is assumed that the Staff was satisfied that the coverage provided from the coordinates in the Cameron, AZ NPRM was satisfactory. No attempt was made here to verify actual hypothetical city-grade coverage of Cameron.

II. Proposed 247C First Mesa, AZ

This Counterproposal requests the allotment of 247C at First Mesa, AZ at coordinates 35-41-09 North Latitude 110-21-43 West Longitude. First Mesa, AZ as previously mentioned, has a 2000 US Census population of 1,124 persons. At the proposed site, First Mesa is completely within the hypothetical city-grade contour of 247C. Additionally, some 63,294 persons would receive an additional full time reception service. Please refer to the coverage map for First Mesa, exhibit F2.

In a large number of cases, this new allotment would represent only the second full time reception service (Gray Area) as is detailed in map exhibit F3 as well as the zoomed view of F3. It is estimated that an area of approximately 411 square kilometers and over 4,400 persons are affected.

The communities which fall within this gray area are:

247C at First Mesa, AZ

Gray Area Coverage

Community	Type	Population	% Cvr	Persons
Chilchinbito	CDP	462	15%	69
Rough Rock	CDP	469	45%	211
Chinle	CDP	5366	60%	3220
Chinle	CCD	9903	5%	465
Pinon	CCD	6284	8%	496
Total				4462

The method used to determine the affected populations is based on uniform population distribution per unit of area.

247C can be allotted at the site reference previously mentioned in full compliance with 73.207 spacing requirements except for two short spacings, KVNA 248C Flagstaff, AZ and the vacant allotment 246C3 at Bagdad, AZ. Please refer to the channel study for 247C at First Mesa, exhibit F1. These short spacings are eliminated by subsequent changes put forth within this Counterproposal.

III. KVNA 248C Dewey-Humboldt, AZ

KVNA 248C Flagstaff, AZ proposes to move, thus eliminating the first short spacing mentioned in paragraph II above and permitting the allotment of 247C at First Mesa, AZ. KVNA, by changing reference site to coordinates 34-14-42 North Latitude 112-21-27 West Longitude, proposes to provide a first local radio service to Dewey-Humboldt, AZ. At the proposed site, Dewey-Humboldt, AZ, a CDP with 6,295 persons according to the 200 US Census, is completely within the hypothetical city-grade contour of 248C. Please refer to the coverage map, exhibit D2

The reallocation of 248C from Flagstaff, AZ to Dewey-Humboldt, AZ results in a coverage increase of some 1,783,000 persons in an area of 19,630 sq. km. While service is lost to only 105,246 persons in an area of 14,129 sq. km. The land areas differ principally because a full facilities Class C is proposed at Dewey-Humboldt. The coverage results are tabulated in the table which can be found in the Summary section below.

The proposed hypothetical 70 dBu contour covers substantially less than half of the 1990 Phoenix Urbanized Area as defined by the US Census. Please refer to map exhibit D5.

This move and the associated new site reference for KVNA are also consistent with the spacing requirements of 73.207, with the exception of three short spacings and one related allotment. Please refer to the channel study for 248C at Dewey-Humboldt, AZ exhibit D1.

Two of the short spacings, both at Parker AZ, arise from a pending proceeding. Another of these short spacings is a vacant allotment 246C3 Bagdad, AZ. The last of these of these is station KRXS 247C2 at Globe, AZ. These short spacings are eliminated by subsequent changes contained within this Counterproposal.

IV. Proposed 247C3 and 248B1 Parker, AZ

The short spacing and implication of a related allotment encountered in the move and reallocation of KVNA are to proposed allotments at Parker, AZ in cut-off proceeding Docket 2001-69. As such, to eliminate any issue of contingency, this Counterproposal offers a single channel which can be substituted for either of two mutually-exclusive proposals in that proceeding. There is further benefit to considering these allotments together which impacts the future usable area for KVNA at Dewey-Humboldt, AZ.

In Docket 01-69, which is cut off from further comment, channel 247C3 and 248B1 were both proposed for Parker, AZ. 247C3 was proposed at coordinates 34-03-11 North Latitude 114-17-18 West Longitude. 248B1 was proposed at 34-15-20 North Latitude 114-17-20 West Longitude. These allotments are separated by only 22.46 KM where 114 KM is required by 73.207. As such, it can be assumed that only one of these allotments can be granted.

While 248C at Dewey-Humboldt is short spaced to only the 248B1 proposal, channel 252 can be substituted for either proposed allotment at the sites proposed in the respective petitions. Please see channel studies Parker, AZ 247C3 and 248B1, exhibits P1 and P2.

V. Vacant 246C3 Bagdad, AZ

Vacant allotment 246C3 at Bagdad, AZ is shortspaced to both the allotment of 247C at First Mesa, AZ and the reallocation of 248C from Flagstaff, AZ to Dewey-Humboldt, AZ. This Counterproposal offers alternate channel 269C3 which can be allotted at the identical reference site to that of 246C3. A channel study is included as exhibit B1

It is assumed that the Staff was satisfied that the coverage provided from the coordinates for 246C3 at Bagdad, AZ is satisfactory. No attempt was made here to verify actual hypothetical city-grade coverage of Bagdad, AZ from this reference site.

VI. KRXS 247C2 Globe, AZ

To accommodate the move of KVNA as described in III above, the final short spacing which must be eliminated involves KRXS 247C2 Globe, AZ. 231C2 can be allotted at the present KRXS site in full compliance with 73.207 except for two short spacings.

One of the short spacings appears to involve a Mexican 231B1 allotment at Sonoita, SO, MX. Upon further analysis, KRXS is already short spaced to a Mexican Class B allotment on 247B at Sonoita, SO, MX and the two Mexican allotments are at the identical site. Because both the present KRXS channel 247 and the proposed replacement channel 231 are subject to identical co-channel short spacings, the channels would seem to be equivalent. Please refer to the channel study for 231C2 at Globe, AZ, exhibit G1

Closer study reveals that the reference site for both the 231B and the 247B allotments at Sonoita, SO, MX is actually located within the United States. In order to confirm this, a surveyor was hired by the Petitioner to map the coordinates and certify that the point described is North of the US-Mexico border. Please refer to the letter and map from Rick Engineering of Tucson, AZ.

The city of Sonoita, SO, MX is at 32-51-02 North Latitude 109-32-15 West Longitude, a distance of 247.15 KM at bearing 230.7 degrees from the KRXS site. If the reference site for Sonoita, SO 231B and 247B is at the Community coordinates, the existing facility and the proposed channel substitution are both clear by over 10 KM. If, however, all that can be assumed is that the reference site is South of the US-Mexico border, then the Surveyor's statement that the reference is "...approximately 1.4 miles North of the US Mexican border..." or 2 KM inside the US border, where the apparent short spacing is only 1.48 KM, would seem to eliminate any reasonable possibility of a short space. The nearest point of land in Mexico which meets the 237 KM spacing requirement to KRXS is 31-50-21 N 112-41-5 W and is closer to either of Ejido Desierta de Sonora, SO or Santa Rosa, SO than to Sonoita, SO. The next nearest allotment site in Mexico is Colonia Reforma, SO. The first point of land inside Mexico and 237 KM from KRXS (calculated to be 31-50-21 N 112-41-5 W) is actually 2 KM closer to the city of Colonia Reforma than to the city of Sonoita.

Finally, an analysis of FCC contours, presuming the actual facility at KRXS and a full-facilities Class B at the likely-erroneous north-of-the-border reference site for Sonoita, SO showed no interference overlap.

The replacement of 247C2 at Globe, AZ with 231C2 is short spaced to only one domestic facility, KXKQ 231C1, Safford, AZ. This remaining short space is eliminated by a move and downgrade of KXKQ.

VII. KXKQ 232C2 Safford, AZ

To accommodate the replacement of 247C2 at Globe, AZ as described in VI above requires a move, channel change and downgrade of KRXS, Safford, AZ. This Counterproposal offers 232C2 as the replacement facility for KXKQ Safford, AZ. 232C2 can be allotted in full compliance with 73.207 spacing requirements at 32-51-02 North Latitude 109-32-15 West Longitude. Please refer to exhibit S1.

This site has the advantage of being considerably closer to the community and Safford, AZ is entirely within the hypothetical city grade contour of the proposed facility. Please refer to map exhibit S2.

VIII. Summary

As the foregoing demonstrates, the net result of this Counterproposal is first local service to two Arizona communities and second reception service to an additional population. There are no individuals that would be underserved as a result of the plan put forth in this Counterproposal.

Dewey-Humboldt, AZ, a Census Designated Place that is home to 6,295 persons receives a first local service. First Mesa, AZ, A Census Designated Place that is home to 1,124 persons receives a first local service. An estimated 4,462 persons who now receive only one interference free service from KTNN-AM, Window Rock will now have a second reception service. I expect if you asked some of those individuals, they would tell you that on stormy nights, KTNN is anything but interference free. As such, a first interference free FM reception service has even greater merit.

In addition, some one and three-quarters millions of persons will receive another interference free service.

The following was compiled from the 2000 U.S. Census:

Population Gain - Loss

Allotment	Community	Present	Proposed	Gain/Loss
248C	Dewey-Humboldt	176,693	1,960,057	1,783,364
246C3/226C3	Bagdad, AZ	2,148	2,238	90
231C1/233C2	Safford, AZ	48,961	36,189	-12,772
Cumulative Gain				1,770,682

Finally, the request for a new first local service at Cameron, AZ is accommodated at coordinates identical to those in the NPRM.

For these reasons, this counterproposal should be adopted in its entirety.

05-17-2002

Frank McCoy

Exhibit B1

FM Study for: ALLOC FCC Database Date: 5/10/2002 34-36-11
 Location: BAGDAD, AZ Channel Class: C3 113-12-04
 [*] by HAAT indicates calculated as missing in database.
 Call City, State Chan Class Freq kW Latitude Dist. Required
 Status Proponent File Number HAAT Longitude Azm. Clear (km)

 >>>>>>> Study For Channel 269 101.7 mHz <<<<<<<<

KZON	PHOENIX, AZ	268 C	101.5	100.	33-19-52	175.99	176	
LIC	Fac. No. 63913	BLH-6108		530	112-03-46	143.0	-0.01	CLOSE
KAHM	PRESCOTT, AZ	271 C	102.1	54.0	34-41-14	99.8	96	
LIC	Fac. No. 61510	BLH-19960111BK	770		112-07-01	84.3	+3.8	CLOSE
KRRK	LAKE HAVASU CITY, AZ	266 C0	101.1	20.0+	34-33-06	91.2	87	
CP	Fac. No. 38314	BPH-20010910ABO	822		114-11-37	266.7	+4.2	CLOSE
ALLOCR	SALOME, AZ	270 A	101.9		33-46-54	98.6	89	
ADD		RM-10344		0	113-36-42	202.7	+9.6	CLOSE
ALLOCR	YUCCA, AZ	266 C1	101.1		34-33-06	91.2	76	
ADD		RM-bg-65		0	114-11-37	266.7	+15.2	CLEAR
ALLOCR	LAKE HAVASU CITY, AZ	266 C1	101.1		34-33-06	91.2	76	
DEL		RM-bg-65		0	114-11-37	266.7	+15.2	CLEAR
KRRK	LAKE HAVASU CITY, AZ	266 C1	101.1	7.10	34-33-06	91.2	76	
LIC	Fac. No. 38314	BLH-19991217ACI	825		114-11-37	266.7	+15.2	CLEAR
KJJJ	LAKE HAVASU CITY, AZ	272 C2	102.3	1.05	34-33-06	91.2	56	
LIC	Fac. No. 63410	BMLH-20010514AAR	814		114-11-37	266.7	+35.2	CLEAR

226C3 F[50,50] 70 dBu Contour



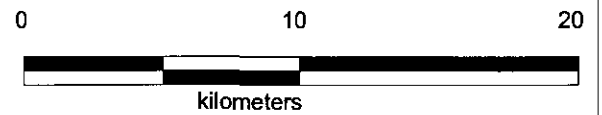
**Community Boundaries of
Bagdad, AZ**



226C3 Hypothetical 70 dBu Contour



**34-33-09
113-17-22**



**Coverage Map For Proposed
226C3 at Bagdad, AZ
Exhibit B2**

05-17-2002

Frank McCoy

Exhibit B3

FM Study for: ALLOC FCC Database Date: 5/10/2002 34-36-11
 Location: BAGDAD, AZ Channel Class: C3 113-12-04
 [*] by HAAT indicates calculated as missing in database.
 Call City, State Chan Class Freq kW Latitude Dist. Required
 Status Proponent File Number HAAT Longitude Azm. Clear (km)

>>>>>>> Study For Channel 269 101.7 mHz <<<<<<<<

KZON	PHOENIX, AZ	268 C	101.5	100.	33-19-52	175.99	176	
LIC	Fac. No. 63913	BLH-6108		530	112-03-46	143.0	-0.01	CLOSE
KAHM	PRESCOTT, AZ	271 C	102.1	54.0	34-41-14	99.8	96	
LIC	Fac. No. 61510	BLH-19960111BK	770		112-07-01	84.3	+3.8	CLOSE
KRRK	LAKE HAVASU CITY, AZ	266 C0	101.1	20.0+	34-33-06	91.2	87	
CP	Fac. No. 38314	BPH-20010910ABO	822		114-11-37	266.7	+4.2	CLOSE
ALLOCR	SALOME, AZ	270 A	101.9		33-46-54	98.6	89	
ADD		RM-10344		0	113-36-42	202.7	+9.6	CLOSE
ALLOCR	YUCCA, AZ	266 C1	101.1		34-33-06	91.2	76	
ADD		RM-bg-65		0	114-11-37	266.7	+15.2	CLEAR
ALLOCR	LAKE HAVASU CITY, AZ	266 C1	101.1		34-33-06	91.2	76	
DEL		RM-bg-65		0	114-11-37	266.7	+15.2	CLEAR
KRRK	LAKE HAVASU CITY, AZ	266 C1	101.1	7.10	34-33-06	91.2	76	
LIC	Fac. No. 38314	BLH-19991217ACI	825		114-11-37	266.7	+15.2	CLEAR
KJJJ	LAKE HAVASU CITY, AZ	272 C2	102.3	1.05	34-33-06	91.2	56	
LIC	Fac. No. 63410	BMLH-20010514AAR	814		114-11-37	266.7	+35.2	CLEAR

05-19-2002

Frank McCoy

Exhibit C1

FM Study for: ALLOCK FCC Database Date: 5/10/2002 35-52-30
Location: CAMERON, AZ Channel Class: A 111-24-48
[*] by HAAT indicates calculated as missing in database.
Call City, State Chan Class Freq kW Latitude Dist. Required
Status Proponent File Number HAAT Longitude Azm. Clear (km)

>>>>>>> Study For Channel 289 105.7 mHz <<<<<<<

KVRDEM	COTTONWOOD, AZ	289 C3	105.7	.300	34-41-11	146.6	142	
LIC	Fac. No. 35865	BLH-19971110KI	779		112-06-58	206.1	+4.6	CLOSE
KOAS	DOLAN SPRINGS, AZ	289 C	105.7	98.0	35-39-07	263.3	226	
LIC	Fac. No. 25692	BLH-20010726AAF	605		114-18-42	265.5	+37.3	CLEAR

Note: This channel study was conducted at the reference site contained in the NPRM. It is noted that, although this reference does not appear to be within the community boundaries of Cameron, AZ, 289A could be allotted with no short spacings at the reference coordinates for Cameron.

05-19-2002

Frank McCoy

Exhibit D1

FM Study for: KVNAFM FCC Database Date: 5/10/2002 34-14-42
 Location: DEWEY-HUMBOLDT, AZ Channel Class: C 112-21-27
 [*] by HAAT indicates calculated as missing in database.
 Call City, State Chan Class Freq kW Latitude Dist. Required
 Status Proponent File Number HAAT Longitude Azm. Clear (km)

 >>>>>>> Study For Channel 248 97.5 mHz <<<<<<<<

KVNAFM FLAGSTAFF, AZ 248 C 97.5 100. 34-58-06 111.9 290
 LIC Fac. No. 68566 BLH-19860925KA 460 111-30-28 43.9 -178.1 SHORT
Note: Existing licensed facility of KVNA. New allotment proposal is mutually exclusive with the existing KVNA facility.

ALLOCR PARKER, AZ 248 B1 97.5 34-15-20 177.9 259
 ADD Docket-01-69 0 114-17-20 270.9 -81.1 SHORT
Note: Proposed in this Counterproposal to be assigned channel 252B1.

KRXSFM GLOBE, AZ 247 C2 97.3 .640 33-17-37 176.1 188
 CP Fac. No. 37577 BPH-19980824IA 1039 110-50-09 126.4 -11.9 SHORT
Note: Proposed in this Counterproposal to be assigned channel 231C2.

ALLOC BAGDAD, AZ 246 C3 97.1 34-36-11 87.1 96
 VAC RM-10015 0 113-12-04 297.4 -8.9 SHORT
Note: Proposed in this Counterproposal to be assigned channel 226C3 or 269C3.

KMXP PHOENIX, AZ 245 C 96.9 98.0 33-20-03 104.72 105
 LIC Fac. No. 6361 BMLH-19941024KC 475 112-03-36 164.7 -0.28 CLOSE

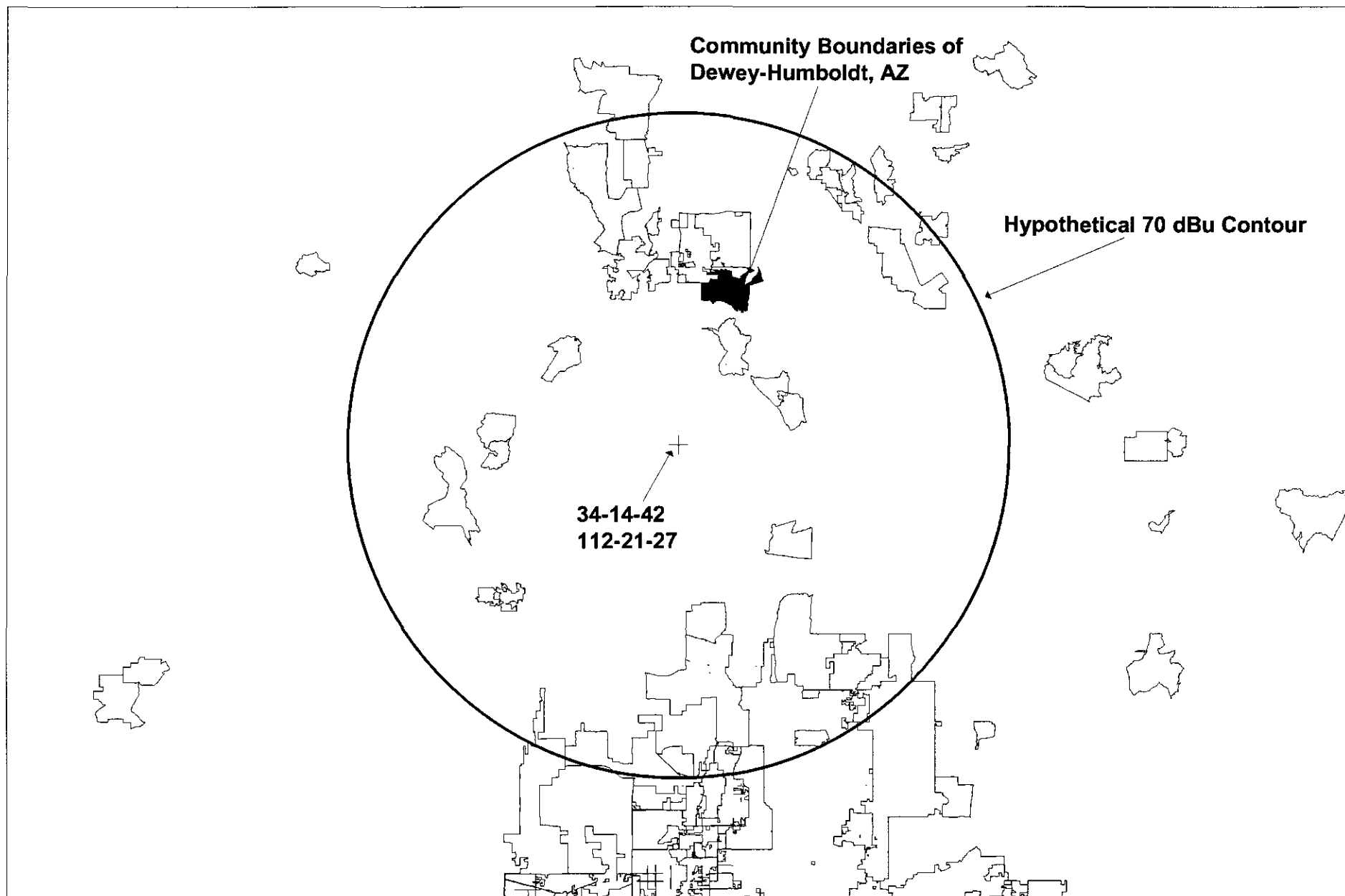
KUPD TEMPE, AZ 250 C 97.9 96.0 33-19-58 104.75 105
 LIC Fac. No. 65166 BLH-19940314KA 494 112-03-53 164.9 -0.25 CLOSE

KRXSFM GLOBE, AZ 247 C3 97.3 .160 33-17-37 176.08 176
 LIC Fac. No. 37577 BLH-19960205KC 1039 110-50-09 126.4 +0.08 CLOSE

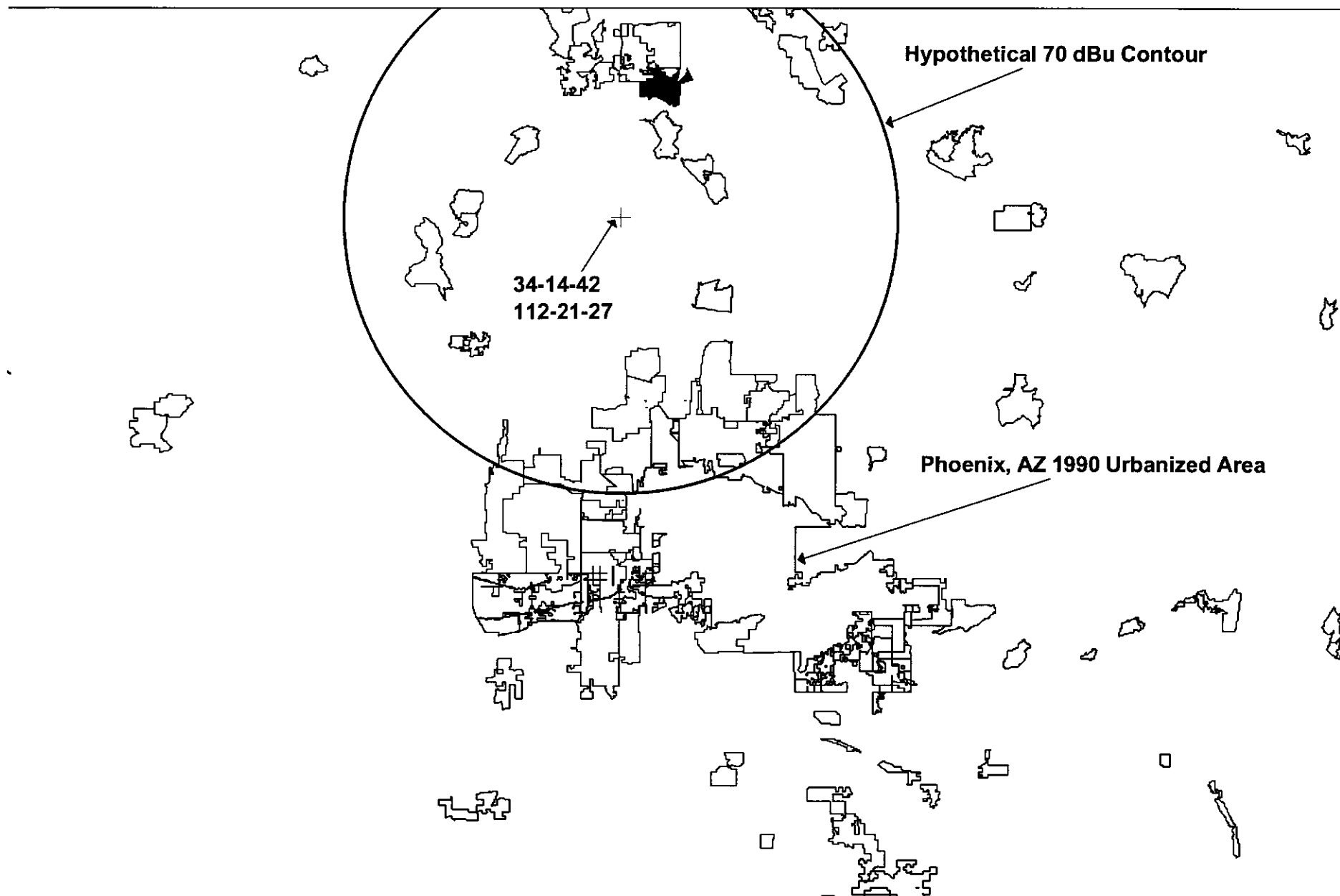
ALLOC FIRST MESA, AZ 247 C 35-41-09 242.41 241
 ADD 110-21-43 48.2 +1.41 CLOSE
Note: New allotment proposed in this Counterproposal.

ALLOCR PARKER, AZ 247 C3 97.3 34-03-11 179.3 176
 ADD RM-10081 0 114-17-18 263.7 +3.3 CLOSE
Note: As elsewhere explained in this Counterproposal, 247C3 and 248B1 are both proposed for Parker, AZ in the same proceeding, which is cut off. Only one of these requests can be accommodated. This Counterproposal requests that, in the event the 247C3 petitioner in RM-10081 prevails, Parker, AZ be assigned 252C3 instead. It is believed that little or no additional spectrum space beyond that required to protect a future substitution of 252B1 for 248B1 is required to similarly protect the 247C3. The benefit is that the usable area for KVNA at Dewey-Humboldt is considerably larger.

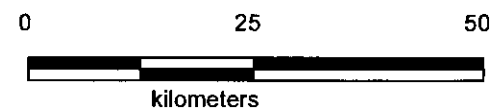
KOAZ ORO VALLEY, AZ 248 A 97.5 6.00 32-19-45 244.4 226
 LIC Fac. No. 39734 BLH-20000421ABC 93 111-03-40 150.0 +18.4 CLEAR

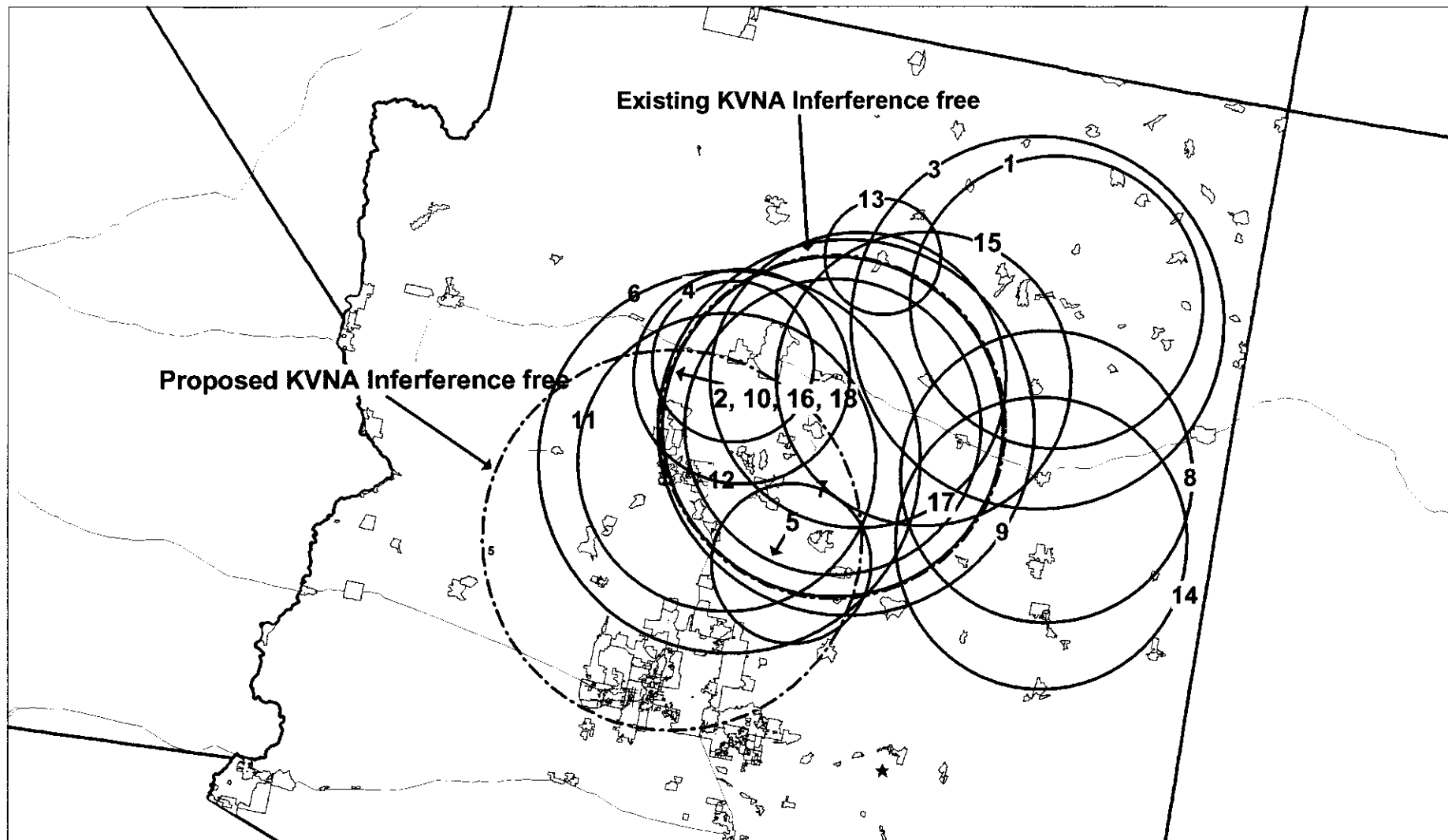


Hypothetical Community Coverage
KVNA 248C Dewey-Humboldt, AZ
Exhibit D2

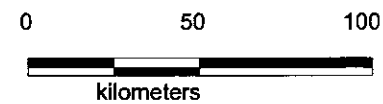


ypothetical Urbanized Area Coverage
VNA 248C Dewey-Humboldt, AZ
xhibit D5





**KVNA Existing and Proposed
Remaining Services Exhibit D4**



Key to Contours

Exhibit D4

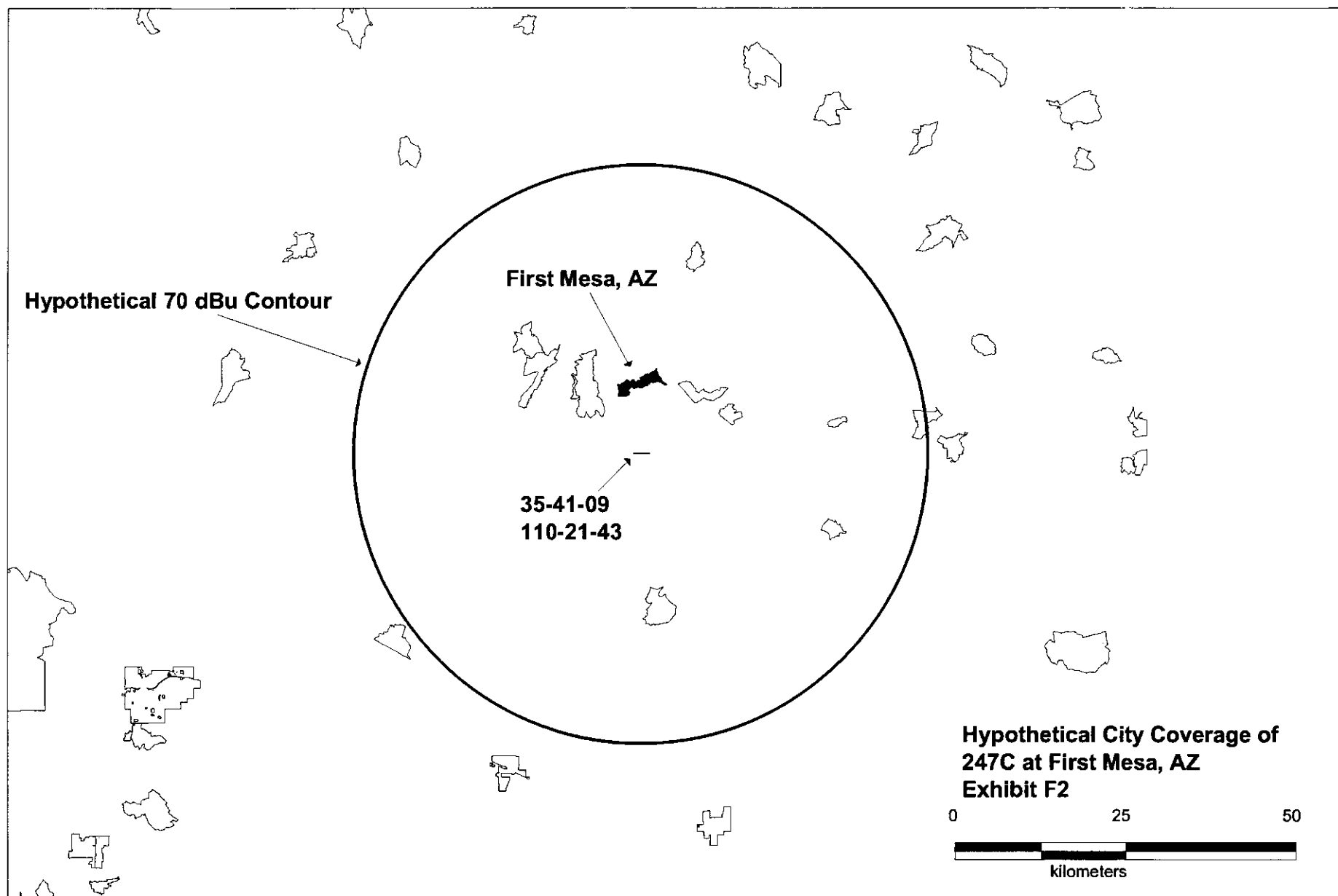
248C Flagstaff, AZ to Dewey-Humboldt, AZ

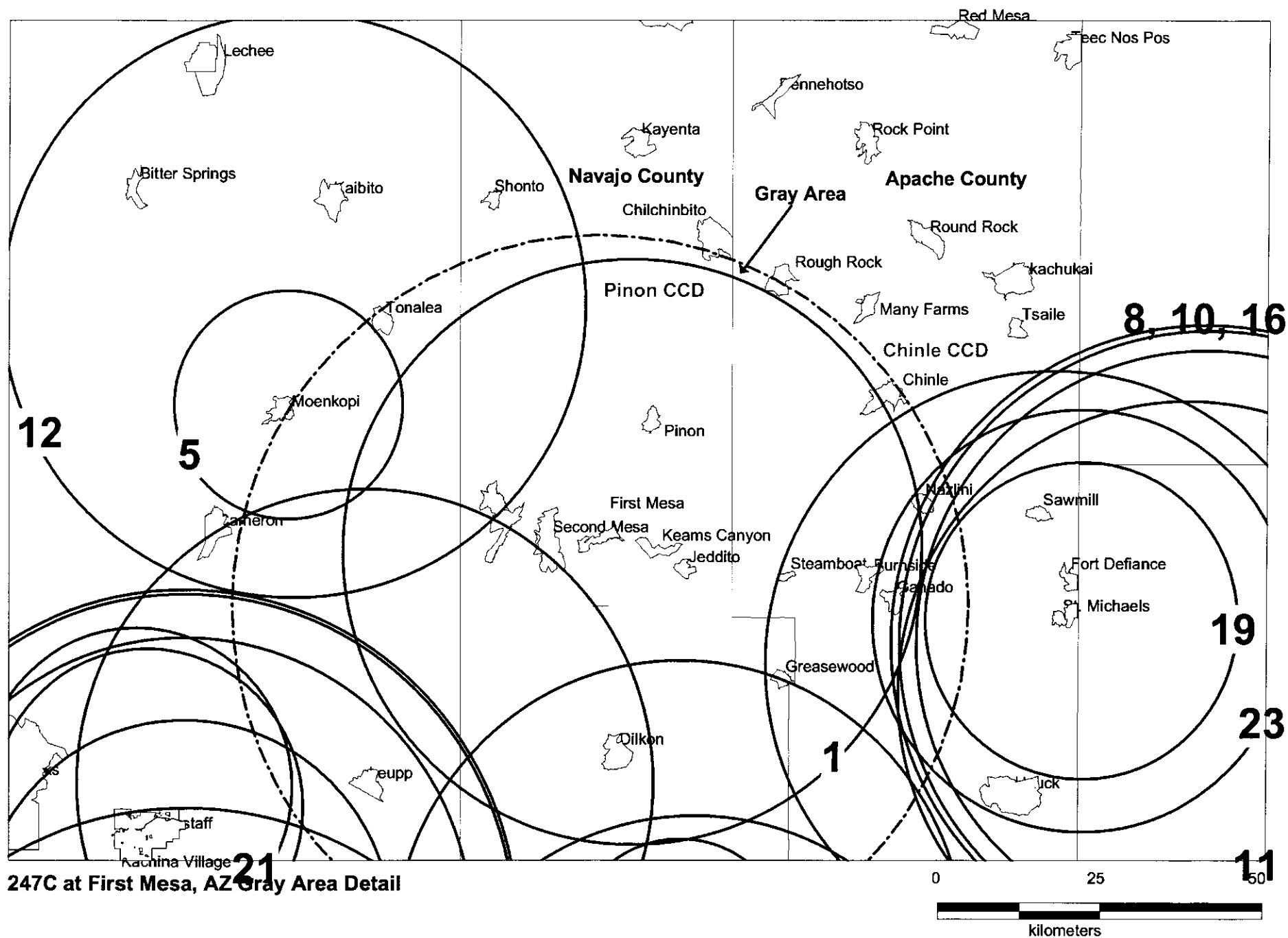
Cont #	Call	City
1	KUYI	Holbrook, AZ
2	KNAU	Flagstaff, AZ
3	PRO 247C	First Mesa, AZ
4	KJZA	Drake, AZ
5	KTJA	Flagstaff, AZ
6	KGCB	Prescott, AZ
7	KPUB	Flagstaff, AZ
8	KZUA	Holbrook, AZ
9	KAFF	Flagstaff, AZ
10	KMGN	Flagstaff, AZ
11	KZGL	Cottonwood, AZ
12	KWMX	Williams, AZ
13	PROP	Cameron, AZ
14	KZUA	Holbrook, AZ
15	KJKI	Leupp, AZ
16	KLOD	Flagstaff, AZ
17	KQST	Sedona, AZ
18	KSED	Sedona, AZ

Exhibit F1

KRXSFM GLOBE, AZ	247 C3	97.3	.160	33-17-37	268.9	237	
LIC	Fac. No. 37577	BLH-19960205KC	1039	110-50-09	189.4	+31.9	CLEAR

Note: KRXS proposed to change channels to 231





Key to Contours

Exhibit F3

247C at First Mesa, AZ

Cont #	Call	City
1	KUYI	Hotevilla, AZ
2	KNAU	Flagstaff, AZ
3	KJTA	Flagstaff, AZ
4	KBMH	Holbrook, AZ
5	KGHR	Tuba City, AZ
6	KPUB	Flagstaff, AZ
7	KZUA	Holbrook, AZ
8	KXXI	Gallup, NM
9	KMGN	Flagstaff, AZ
10	KKOR	Gallup, NM
11	KWRK	Window Rock, AZ
12	VAC	Tuba City, AZ
13	KZUA	Holbrook, AZ
14	KJKI	Leupp, AZ
15	KGLX	Gallup, NM
16	KXTC	Thoreau, NM
17	KLOD	Flagstaff, AZ
18	VAC	Gallup, NM
19	KWIM	Window Rock, AZ
20	KQST	Sedona, AZ
21	VAC	Flagstaff, AZ
22	KAJM	Payson, AZ
23	KWIM	Window Rock, AZ
24	KFLX	Kachina Village, AZ
25	VAC	Heber, AZ
26	KFMQ	Gallup, NM
27	KSED	Sedona, AZ

05-17-2002

Frank McCoy

Exhibit G1

FM Study for: KRXSFM FCC Database Date: 5/10/2002 33-17-37
 Location: GLOBE, AZ Channel Class: C2 or C3 110-50-09
 [*] by HAAT indicates calculated as missing in database.
 Call City, State Chan Class Freq kW Latitude Dist. Required
 Status Proponent File Number HAAT Longitude Azm. Clear (km)

 >>>>>>> Study For Channel 231 94.1 MHz <<<<<<<<

Note: The FCC database shows a 247C3 facility licensed for KRXS as BLH-19960205KC. This facility reference is at the identical site as the above. Given that the second record is at the same site but at a lower class (C3 rather than C2) no separate channel study was done for the substitution of 247C3 with equivalent 231C3. It is assumed that the C3 facility would be fully spaced.

KXKQ SAFFORD, AZ 231 C1 94.1 1.00 32-39-01 116.7 130
 LIC Fac. No. 40916 BLH-19970805KB 1307 109-50-53 127.4 +0.82 SHORT

Note: Existing licensed facility of KXKQ-FM. This petition proposes to modify KXKQ to operate on 233C2 at a different site.

ALLOC SONOITA, SO 231 B 94.1 31-51-52 235.52 237
 Fac. No. 95290 - 0 112-41-30 228.2 -1.48 SHORT

Note: These SONOITO, SO, MX coordinates are within the United States. See surveyor's statement, map exhibits.

KXKQ SAFFORD, AZ 232 C2 94.1 32-51-02 130.82 130
 ADD 109-32-15 111.7 +0.82 CLOSE

Note: Proposed new channel, class and site for KXKQ.

ALLOC OVERGAARD, AZ 232 C3 94.3 34-23-27 124.5 117
 ADD RM-9986 0 110-33-09 12.1 +7.5 CLOSE

KMGN FLAGSTAFF, AZ 230 C 93.9 96.0 34-58-08 195.9 188
 LIC Fac. No. 49688 BMLH-19940818KG 460 111-30-28 341.7 +7.9 CLOSE

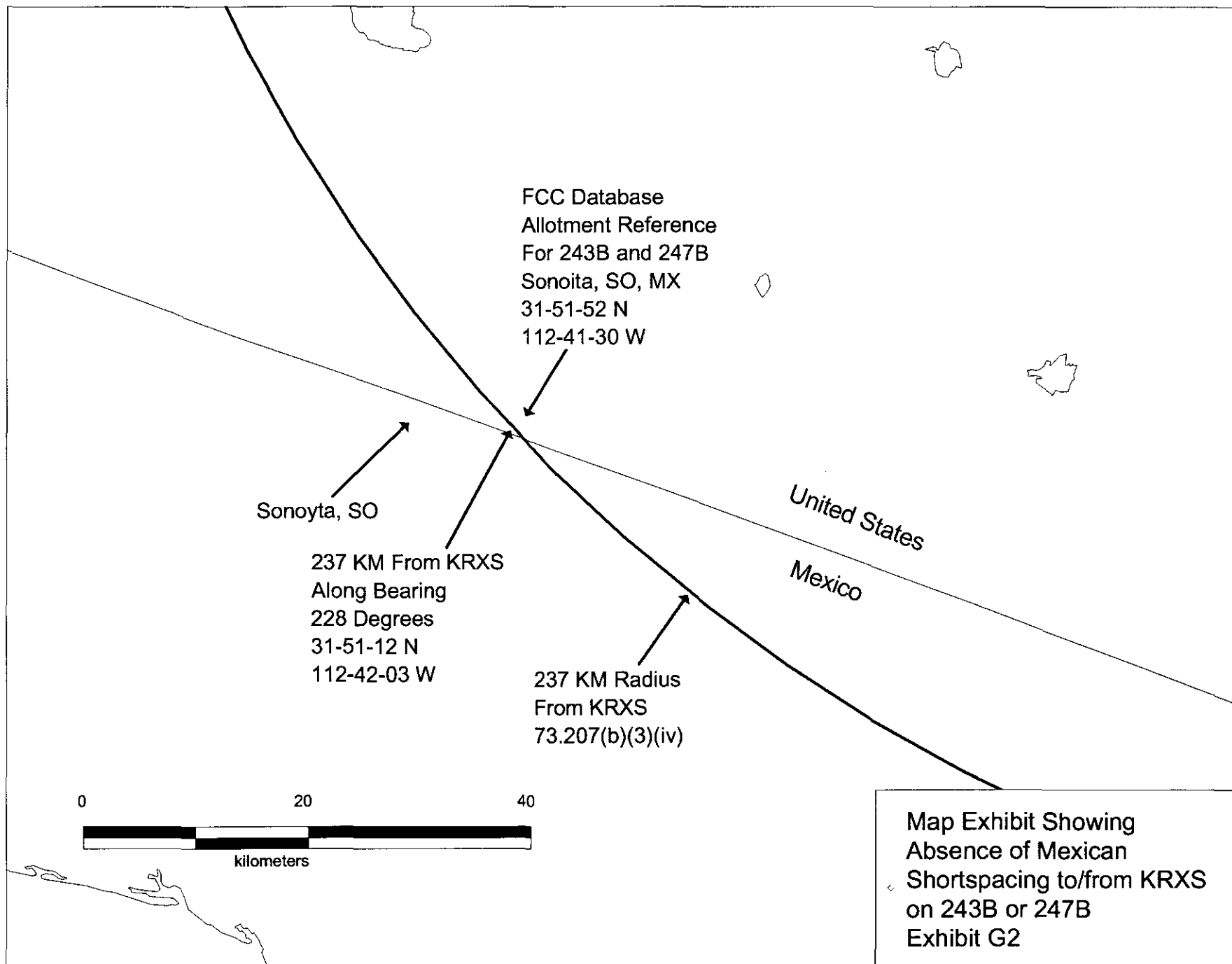
KOOLFM PHOENIX, AZ 233 C 94.5 100. 33-20-02 114.2 105
 LIC Fac. No. 13506 BLH-19860112KB 504 112-03-42 272.6 +9.2 CLOSE

KRQQ TUCSON, AZ 229 C 93.7 91.0+ 32-14-56 118.8 105
 LIC Fac. No. 53591 BLH-19870909KD 619 111-06-57 192.8 +13.8 CLOSE

ALLOCR WICKENBURG, AZ 231 C3 94.1 33-55-34 194.8 177
 DEL RM-10016 0 112-47-40 291.6 +17.8 CLEAR

KSWG WICKENBURG, AZ 231 C3 94.1 6.40+ 33-55-34 194.8 177
 LIC Fac. No. 11216 BLH-19970128KB 197_ 112-47-40 291.6 +17.8 CLEAR

Note: The FCC database incorrectly shows the channel substitution at Chino Valley for KFPB as 232C3 with reference site 35-52-03 N 112-33-04 W. The intended site from the petitioner's filing is 34-52-03 N 112-33-04 W. Petitioner NPR, LLC's intended site has been checked against this proposal and it is found that the substitution at Chino Valley is 235.67 KM distant (where 190 KM is required).





RICK
ENGINEERING
COMPANY

San Diego • Riverside • Orange • Phoenix • Tucson

VIA FAX AND US MAIL
1-847-540-5855

May 16, 2002

Mr. Frank McCoy, Vice President
AMERICAN MEDIA SERVICES
24180 Forest Drive
Forest Lake, IL 60047

SUBJECT: N 31°51'52" LATITUDE, W 112°41'30" LONGITUDE, NAD 27 DATUM
REC JN 3048-T

Dear Mr. McCoy:

On May 16, 2002 Rick Engineering examined and plotted the coordinates referenced above using DeLorme 3-D Topo Quads and associated DeLorme software. We find that these coordinates are within the borders of the United States, at a distance of approximately 1.4 miles north of the US-Mexico border near Lukeville, Arizona (Please see attached map).

An invoice is also attached and is due and payable when received.

If you have any questions, please feel free to contact me.

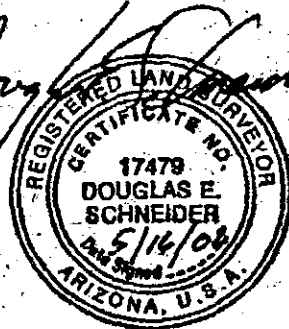
Sincerely,

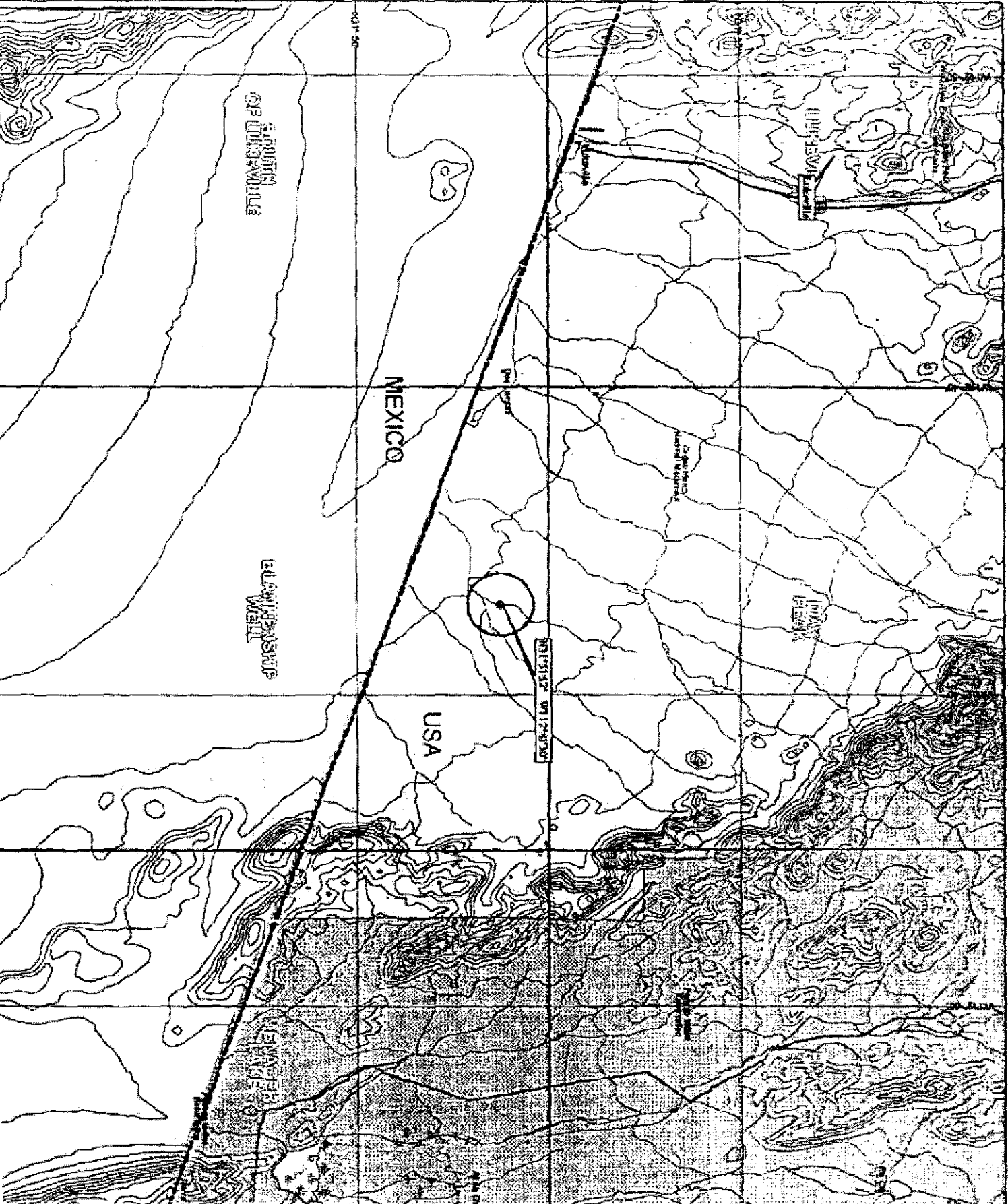
RICK ENGINEERING COMPANY, INC.

Douglas E. Schneider, R.L.S.
Survey Manager

DES:sj HAD_30483048T McCoy.wpd

Enclosures





Topographic Copyright © 1979 Defense Intelligence Agency

Scale 1:50,000

Sheet 1

Sheet 2

Sheet 3

Sheet 4

Sheet 5

Sheet 6

Sheet 7

Sheet 8

Sheet 9

Sheet 10

IDJAMS CHICAGO

TEL 3520 322 6956

MAY-16-2002 04:06PM

Page 1 of 1

05-15-2002

Frank McCoy

Exhibit P1

FM Study for: ALLOCR

FCC Database Date: 5/10/2002

34-03-11

Location: PARKER, AZ

Channel Class: C3

114-17-18

[*] by HAAT indicates calculated as missing in database.

Call City, State

Chan Class Freq kW

Latitude

Dist.

Required

Status Proponent

File Number HAAT

Longitude

Azm.

Clear (km)

>>>>>>> Study For Channel 252 98.3 MHz <<<<<<<<

ALLOCR RUMOROSA, BN	252 B	98.3		32-33-11	232.2	211	
	RM-		0	116-01-42	224.7	+21.2	CLEAR
KLK	NEEDLES, CA	250 C1	97.9 29.5	35-02-06	109.2	76	
LIC	Fac. No. 8385	BLH-19950502KA	473	114-22-09	356.1	+33.2	CLEAR
KKLD	PRESCOTT VALLEY, AZ	252 C2	98.3 .880	34-41-11	211.8	177	
LIC	Fac. No. 41462	BLH-19960125KD	776	112-06-58	70.0	+34.8	CLEAR

05-15-2002

Frank McCoy

Exhibit P2

FM Study for: ALLOCR

FCC Database Date: 5/10/2002

34-15-20

Location: PARKER, AZ

Channel Class: B1

114-17-20

[*] by HAAT indicates calculated as missing in database.

Call City, State

Chan Class Freq kW

Latitude

Dist.

Required

Status Proponent

File Number HAAT

Longitude

Azm.

Clear (km)

>>>>>>> Study For Channel 252 98.3 mHz <<<<<<<<

KKLD	PRESCOTT VALLEY, AZ	252 C2	98.3	.880	34-41-11	205.3	200	
LIC	Fac. No. 41462	BLH-19960125KD	776		112-06-58	75.9	+5.3	CLOSE
KLUK	NEEDLES, CA	250 C1	97.9	29.5	35-02-06	86.8	77	
LIC	Fac. No. 8385	BLH-19950502KA	473		114-22-09	355.2	+9.8	CLOSE
KLUCFM	LAS VEGAS, NV	253 C	98.5	97.0	36-00-29	205.1	193	
LIC	Fac. No. 47744	BLH-19870211KA	360		115-00-20	341.6	+12.1	CLOSE
KHWY	ESSEX, CA	255 B	98.9	10.0	34-52-50	99.6	71	
LIC	Fac. No. 34556	BLH-19950822KB	327		115-04-05	314.3	+28.6	CLEAR
ALLOCR	RUMOROSA, BN	252 B	98.3		32-33-11	248.6	211	
		RM-		0	116-01-42	221.1	+37.6	CLEAR

```

FM Study for: KXKQ                      FCC Database Date: 5/10/2002      32-51-02
Location: SAFFORD, AZ                  Channel Class: C2          109-32-15

    [*] by HAAT indicates calculated as missing in database.
Call   City, State      Chan Class Freq  kW  Latitude  Dist.  Required
Status Proponent       File Number HAAT  Longitude  Azm.   Clear (km)

```

>>>>>> Study For Channel 232 94.3 mHz <<<<<<<

KXKQ	SAFFORD, AZ	231 C1	94.1	1.00	32-39-01	36.6	158	
LIC	Fac. No. 40916	BLH-19970805KB	1307		109-50-53	232.7	-121.4	SHORT
Note: Existing licensed facility of KXKQ								

ALLOC	HUACHUCA CITY, AZ	232 A	94.3		31-32-30	165.83	166	
VAC		RM-9977		0	110-23-20	209.2	-0.17	CLOSE

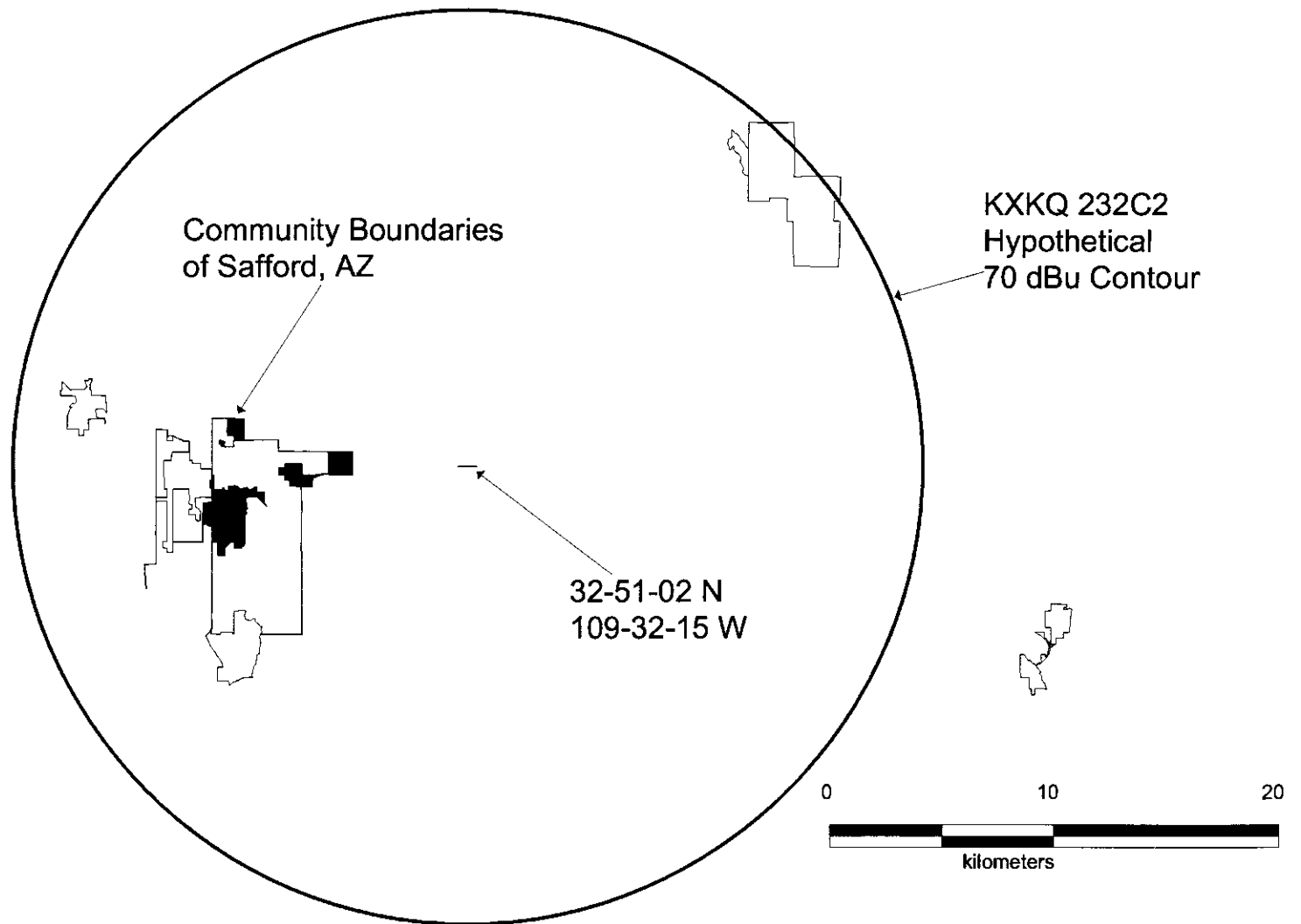
KRXS	Globe, AZ	231	C2	93.7	33-17-37	130.82	130		
	CP - ADD				110-50-09	292.4	+0.82	CLOSE	

Note: KRXS presently operates at this site on 247C2, although the FCC database shows KRXS as a CP. This petition proposes that KRXS be modified to operate on 231C2.

KDEM	DEMING, NM	232 A	94.3	3.00	32-15-05	179.9	166	
LIC	Fac. No. 39245	BLH-7744		59	107-45-28	111.2	+13.9	CLOSE

ALLOC	OVERGAARD, AZ	232 C3	94.3		34-23-27	195.0	177	
ADD		RM-9986		0	110-33-09	331.4	+18.0	CLEAR

ALLOCR HURLEY, NM	229 C1	93.7	32-53-00	114.3	79	
ADD	RM-nj182	0	108-19-00	87.8	+35.3	CLEAR



Coverage Map For KXKQ, Safford, AZ
Exhibit S2

May-18-02 08:23A

Station KXXQ-FM
Safford, AZ


..... McMurray Communications, Inc., licensee of Station KXXQ-FM, Safford
... agrees to have Station KXXQ-FM's reference site changed and channel changed
232C2. McMurray Communications, Inc. will apply to implement the foregoing
the Commission so order. McMurray Communications, Inc. understands that this
be used in a filing with the Commission and hereby authorizes its use for that purpose.

I verify that this statement is true, complete and correct to the best of my knowledge
belief and is made in good faith.

McMurray Communications, Inc

By: _____

Its: _____


President